

EXHIBIT N



FREEDOM OF INFORMATION ACT OFFICE
UNIVERSITY OF MICHIGAN

March 6, 2020



Re: [REDACTED]

Dear [REDACTED]:

Thank you for your check in the amount of \$ [REDACTED], in payment of the balance due for costs associated with processing your Freedom of Information Act request [REDACTED].

You requested:

All money expended in attorney fees and any and all other additional fees expended by the University of Michigan for the following cases.

- 1) John Doe vs. David H. Baum, et al. 16-cv-13174.
- 2) John Doe vs. University of Michigan, et al. 18-cv-11776.
- 3) Andrew Lipian vs. University of Michigan, et al. 18-cv-13321.

Also please include all invoices submitted by law firms representing the above cases on behalf of the University of Michigan. I am also asking that you include details of expenditures on the invoices. Please note that I am not asking for work product or anything that would violate attorney-client privilege. Rather I am asking for details on how the money was spent, such as hours in depositions, court appearances, etc., clearly documents available under FOIA.

I am asking that you submit the records generated from Aug. 16, 2019 to Jan. 6, 2020.

Your request is granted in part. Enclosed find responsive records. Some material has been removed from the enclosed invoices pursuant to Section 13 (1) (g) of the Michigan Freedom of Information Act, which protects from disclosure "information on or records subject to the attorney-client privilege." Bank and account information has been removed from the invoices pursuant to Section 13 (1) (u) of the Act, which exempts from disclosure "records of a public body's security measures, including security plans, security codes and combinations, passwords, passes, keys, and security procedures, to the extent that the records relate to the ongoing security of the public body;" and Section 13 (1) (y) of the Act, which exempts "[r]ecords or information of measures designed to protect the security or safety of persons or property..." To provide a further description of the exempted material would reveal the contents of the exempt information and thus defeat the purpose of the exemption. Therefore, pursuant to Section 14 (2) of the Michigan Freedom of Information Act, no further description is required.

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Please note that within 180 days from the date of this letter, you have the right to appeal the denial of information to the President of the University or seek judicial review in the Michigan court of claims to try to compel disclosure. If you elect to appeal and the President upholds the denial, you may still seek judicial review within the 180-day period.

An appeal to the President must be submitted in writing to: President's Office, c/o Liz Barry, The University of Michigan, 2080 Fleming Administration Building, 503 Thompson Street, Ann Arbor, MI 48109-1340 (or by email to: presoff@umich.edu). The statement must (1) identify the request and the final determination by the FOIA officer that is being appealed, (2) specifically state the word "appeal," and (3) identify the reason or reasons why the final determination should be reversed.

If you seek judicial review in the Michigan court of claims and prevail, you will be awarded reasonable attorney's fees, costs and disbursements incurred in maintaining the action. If you prevail in part, you may still be awarded complete or partial reimbursement for those expenses. In addition to actual and compensatory damages, you will be awarded punitive damages in the amount of \$1,000.00 if the court finds that the University was arbitrary and capricious in its denial.

A copy of Section 10 of the Michigan FOIA is available for your reference and review online at <http://foia.vpcomm.umich.edu/foia-right-to-appeal/>.

Sincerely,



Patricia J. Sellinger
Chief Freedom of Information Officer

Enclosures

The University of Michigan has incurred the following legal fees in the federal civil lawsuits specified as of January 6, 2020:

- 1) John Doe vs. David H. Baum, et al. 16-cv-13174 - **\$1,780,328.41**
- 2) John Doe vs. University of Michigan, et al. 18-cv-11776 - **\$1,140,587.54**
- 3) Andrew Lipian vs. University of Michigan, et al. 18-cv-13321 - **\$507,532.13**